

# WISCONSIN LEGISLATIVE COUNCIL STAFF

## RULES CLEARINGHOUSE

**Ronald Sklansky**  
Director  
(608) 266-1946

**Richard Sweet**  
Assistant Director  
(608) 266-2982



**David J. Stute, Director**  
Legislative Council Staff  
(608) 266-1304

One E. Main St., Ste. 401  
P.O. Box 2536  
Madison, WI 53701-2536  
FAX: (608) 266-3830

## CLEARINGHOUSE RULE 95-157

### Comments

**[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated October 1994.]**

### 5. Clarity, Grammar, Punctuation and Use of Plain Language

a. The rule is not clear as to how substitute teacher permit renewals will be regulated. Under s. PI 3.03 (8) (b), a substitute teacher permit is valid for a period “not to exceed 5 years.” Are those consecutive years or cumulative school years or calendar years? The last sentence of the paragraph indicates that the permit may be renewed, but does not indicate the length of the renewal (five years additional?). Also, the third sentence should be replaced by the following: “The department shall issue a permit under this paragraph if a district administrator or a designated official of an employing school district requests a permit.”

b. Under s. PI 3.39, is there a need to provide for recommendations for persons providing special education services through cooperative educational service agencies? Also, can a person obtain a license only if he or she is employed by a school district and recommended to receive a license?

c. The creation of a new principal’s license and the elimination of several existing level-specific principal licenses raise questions regarding the future treatment of those licenses. For example, will a licensee be able to “convert” a current level-specific license to the broader PK-12 license? If so, how will this be accomplished? Does the rule have the effect of allowing a high school to hire a high school principal who has a “middle level” only license now? This aspect of the rule should be reviewed and clarified.

d. If the agency intends the administrator licensing aspects of the rule to apply only to persons who graduate from an approved course, then that should be expressly stated. Also, in s.

PI 3.57 (intro.), what does the phrase “or the equivalent” mean? Does the phrase refer to some “unapproved” program? This should be clarified.

e. The term “Principalship,” which is used in the existing rule that is repealed and recreated, could be replaced with the phrase “The role of the principal...” in s. PI 3.57 (1). Principalship has an awkward, even naval, ring to it.